

EXHIBIT B

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Attorneys for Uber

UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF CHRISTOPHER V.
COTTON**

This Document Relates to:

ALL ACTIONS

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

I, Christopher V. Cotton, state as follows:

1. I am an attorney at Shook, Hardy & Bacon L.L.P., counsel of record for Defendants Uber Technologies, Inc., Raiser, LLC, and Raiser-CA, LLC (collectively, “Uber” or “Defendants”). I offer this Declaration in the above-captioned matter in support of Uber’s Motion for Entry of an Order to Show Cause Why 6 Plaintiffs Who Have Submitted Non-Bona-Fide Receipts Should Not Be Dismissed with Prejudice.
2. Attached as **Exhibit 1-A** is a true and correct copy of a bona fide receipt from Uber’s systems for a 27-minute ride that occurred on November 30, 2022, in Alabama for a total of \$34.94.
3. Attached as **Exhibit 1-B** is a true and correct copy of a purported receipt submitted by Plaintiff with MDL ID 2642 in the above-captioned matter.
4. Attached as **Exhibit 2-A** is a true and correct copy of a bona fide receipt from Uber’s systems for a 5-minute ride that occurred on January 5, 2018, in Kent, Washington with a subtotal of \$4.13.
5. Attached as **Exhibit 2-B** is a true and correct copy of a purported receipt submitted by Plaintiff with MDL ID 1384.
6. Attached as **Exhibit 3** is a true and correct copy of a purported receipt submitted by Plaintiff with MDL ID 1507.
7. Attached as **Exhibit 4** is a true and correct copy of a purported receipt submitted by Plaintiff with MDL ID 3841.
8. Attached as **Exhibit 5** is a true and correct copy of a purported receipt submitted by Plaintiff with MDL ID 3659.
9. Attached as **Exhibit 6** is a true and correct copy of a purported receipt submitted by Plaintiff with MDL ID 1199.
10. Attached as **Exhibit 7** is a true and correct copy of a bona fide receipt produced by Uber for a ride by Plaintiff with MDL ID 1384.

11. Attached as **Exhibit 8** is a true and correct copy of a bona fide receipt from Uber's systems for a 53-minute ride that occurred on June 12, 2022, in Las Vegas, Nevada for a total of \$25.84.

12. Attached as **Exhibit 9** a true and correct copy of a bona fide receipt from Uber's systems for a 10-minute ride that occurred on August 18, 2021, in Gulf Breeze, Florida for a total of \$14.99.

13. Attached **Exhibit 10** is a true and correct copy of a letter sent by Uber's counsel, dated May 14, 2024, to counsel for Plaintiff with MDL ID 1199.

14. Attached as **Exhibit 11** is a true and correct copy of Peiffer Wolf Carr Kane Conway & Wise, LLP's Motion to Withdraw as Counsel for Plaintiff with MDL ID 1384, dated January 8, 2025.

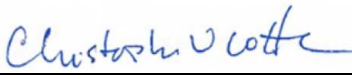
15. Attached as **Exhibit 12** is a true and correct copy of the Court's order, dated February 3, 2025, granting Peiffer Wolf Carr Kane Conway & Wise, LLP's Motion to Withdraw as Counsel for Plaintiff with MDL ID 1384.

16. Attached as **Exhibit 13** is a true and correct copy of the Ride Information Form uploaded by Plaintiff with MDL ID 2774.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: August 25, 2025

Respectfully submitted,

By: 
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